

1 managed both tops and selected routers. The only
2 thing that my company at this time can interconnect
3 with the top, it's just a trunk, and the top acts
4 as a tandem per se. There's no physical conveyance
5 to the operator person. The tops would just see a
6 911 call coming in and reroutes it to the trunk
7 that was established from the top switch to the two
8 selected router or tandem in the area, and that's
9 how the call progresses.

10 So, it behooves me why would Verizon could
11 not allow us to do this because, to me, this is
12 still a 911 network. The operator does not
13 facilitate any type of call. It's the machine,
14 it's a tandem, it's acting as a tandem. And if you
15 talk with Nortel, the designing tech, plus the
16 network survival--standard organization made this
17 recommendation, and this is what Nortel came about,
18 that the tops office will act as a tandem. So, to
19 me, it's just a switching platform, not an
20 operator-type service.

21 MR. KEHOE: I would like to ask the
22 Verizon witness, is it technically feasible for

1 WorldCom to go through the top switch for this
2 purpose?

3 MR. GREEN: Would they be able to place
4 trunks in and connect with the tops? Yes. But I
5 did contact my operator services folks this
6 morning, and I posed this question to them, and I
7 said, "You know, what--would it be detrimental to
8 us to allow them to pass through the top switch,"
9 and they said yes, it would be.

10 And the reason they said it would be is
11 that they said that by allowing them to have trunks
12 going into our operator position, they can't
13 prevent them from sending other types of traffic.
14 And I'm not saying WorldCom would do this, but they
15 can't prevent them from putting other types of
16 traffic through that switch. And, in essence, what
17 a CLEC could do is they could use us as their
18 overflow, and when their operator services were
19 filled, the calls could come flowing through our
20 operator services positions. And it would be very
21 difficult to maintain the proper--the proper
22 capacity loads and the proper number of people to

1 have on duty at any one time, if we didn't expect
2 that type of traffic to be flowing through.

3 So, could we do it? Yes.

4 Would it be advisable? No.

5 What they also told me is WorldCom
6 could--and what many other CLECs do do--is they
7 establish another trunk from their POT and the
8 calls are passed through another route through
9 their POT back over to the tandems. In essence, it
10 acts the same way that our Verizon tops would act
11 or operate.

12 MR. KEHOE: Would WorldCom have the
13 capability of establishing that?

14 MR. SIGUA: To his last suggestion?

15 MR. KEHOE: Yes.

16 MR. SIGUA: The last suggestion would
17 actually--what it would do is actually make me put
18 out another trunk group like what I have my normal
19 path, all right? They are both diverse. Let's say
20 if I have two co-location in this area on those
21 handoff point, one goes to one tandem A, and the
22 other one goes to tandem B.

1 Now, when I make my third handoff point,
2 the question is, where do I hand out--where do I
3 hand that call to? Do I have to go back again to
4 co-lo A? If you tell me to go back to co-lo A, the
5 redundancy is not built there. If I have a problem
6 there with power outage, you knocked out two of my
7 path because now the dual diversity issue had not
8 been met. That's how come it's key in this forum
9 that the diversity issue be met, if it's
10 cost-effective and it doesn't really add any
11 detriment to the network.

12 As far as the issue he has raised us using
13 this platform is ludicrous in the sense that the
14 only traffic--I am speaking for this company--going
15 to the third choice is 911, period. All right?
16 So, it is blocked. There is no way that no other
17 translation people can point traffic to that, all
18 right? I could even make an assurance that
19 WorldCom will take all the measures put in place
20 that no translation person that's capable could
21 make those entries, all right? Will sign off, that
22 they will not touch that route other than 911.

1 With that constant, it will meet the
2 requirement that Verizon is saying, and I concur
3 that because, like I've said, traffic is a
4 measurement of the functionality of any switch.
5 So, if you put too much load in one design, you are
6 going to overload it, and so if we use that third
7 choice for regular operator service, yeah, it
8 defeats the purpose of the redundancy in the
9 network. It undermines the 911 network, and it
10 undermines operator service.

11 MR. KEHOE: Again for the WorldCom
12 witness, does the estimate of about 20 public
13 service answering point coordinators in Virginia
14 sound about right?

15 MR. SIGUA: When I have opened my market
16 here--this is when I was in MFS and not MCI,
17 okay--I dealt with, quote-unquote--I forgot the
18 person's name who was the elected coordinator for
19 northern Virginia at that time, who has given me
20 information for Alexandria, per se, and Leesburg
21 and Fairfax County and all the various agencies
22 that I need to speak with, along with Verizon. Of

1 course, I spoke with them as incumbent. And
2 whatever piece that individual PSAP is there
3 because really we do not provide that granularity.
4 It's really the selective router that actually
5 routes those calls, but I need to make a physical
6 contact with the agency, whether that agency--

7 MR. DYGERT: Could I interrupt you for
8 just a minute. I think it was a pretty simple
9 question. Does 20 sound like--

10 MR. SIGUA: I have no idea.

11 MR. DYGERT: That's enough, thank you.

12 MR. KEHOE: And I take it you would have
13 to contact--rather, you think that maybe the
14 coordinator wouldn't have the alternative routing
15 numbers? You might have to contact the public
16 service answering point itself.

17 MR. SIGUA: Why we make--

18 MR. KEHOE: If I could have a yes or no.

19 MR. SIGUA: To get the ten-digit number?

20 MR. KEHOE: Yes.

21 MR. SIGUA: That's what we do. We tried
22 to get a one ten-digit number to address all the 20

1 PSAP in the area. That one PSAP can use a transfer
2 key so that when a call comes to the ten-digit
3 number, they could route it to the speed-dialing
4 equipment in the PSAP through this various entity
5 that could serve that phone call.

6 MR. KEHOE: And you could get that number
7 from the PSAP coordinator?

8 MR. SIGUA: Like what my colleague had
9 said, northern Virginia had, because of the
10 platform that Verizon would put forth with the
11 third route to the tops, they feel they do not need
12 this type of redundancy. It's built into there,
13 that the service Verizon is giving, all right?

14 At this time, though, I would deliver, if
15 you look at national safety, we have it in New York
16 where the whole tandem did go down, and to back
17 that up because now we have latitude to back up a
18 system, we did both Verizon and WorldCom contacted
19 New York City to build the ten-digit number. New
20 York City themselves thought they did not like
21 ten-digit number, but because of the situation at
22 hand they did build in the ten-digit number.

1 MR. KEHOE: But I'm confused and I would
2 just like to know yes or no.

3 Do public service answering point
4 coordinators in Virginia provide ten-digit numbers,
5 or do they not?

6 MR. SIGUA: On that? No, they don't, but
7 they do when we press them because we press public
8 safety issue. Like the first example I gave as far
9 as operator service, when a person cannot reach
10 911, they dial it and they get busy. The next
11 thing that comes to there is dialing operator. So,
12 we have to give our operator who was not local for
13 the other side of the country, Mattoon, Illinois,
14 they query the customer's information, and they
15 will dial the ten-digit number to northern
16 Virginia. And that's the leverage we use time and
17 time again whatever interface with northern
18 Virginia that has that authority to give me, that's
19 the leverage I use to obtain that number.

20 MR. KEHOE: Thank you very much. I have
21 no further questions.

22 MR. DYGERT: Any questions on redirect?

1 MR. OATES: No questions from Verizon. I
2 would simply like to move into evidence
3 Verizon--what has been marked as Verizon
4 Exhibit 60. And again, I can authenticate it
5 through the witness, or if WorldCom has no
6 objection I will just offer it.

7 MR. MONROE: I don't think I have an
8 objection. I want to clarify that Exhibit 60
9 represents Verizon's latest proposal and is not
10 necessarily agreed to by WorldCom.

11 MR. OATES: That is correct. This is
12 Verizon's latest proposal, the product of mediation
13 and discussion between Mr. Sigua and Mr. Green
14 offered to WorldCom yesterday.

15 MR. DYGERT: Thank you. That's admitted.
16 (Verizon Exhibit No. 60 was
17 admitted into evidence.)

18 MR. MONROE: I have no redirect.

19 MR. DYGERT: Good. Thank you very much,
20 gentlemen. You are excused.

21 MR. MONROE: Mr. Dygert, this has been
22 marked as WorldCom Exhibit 45. This is intended to

1 replace the original WorldCom Exhibit 45 which, as
2 you will recall, did not have a diagram referenced
3 in the first page. The first page is the same as
4 the original. The only difference is there is now
5 a diagram attached, so we would move to have this
6 to replace the original WorldCom 45.

7 MR. DYGERT: Thank you. It's in the
8 record now.

9 QUESTIONS FROM STAFF

10 MR. GOYAL: Back to subpanel five. Since
11 we spent most of the time on the one issue, we
12 should stick to it.

13 Mr. Albert, would it be safe to say the
14 lower case end MUXing is the MUXing necessary for
15 Verizon to terminate trunk routes into its own
16 switches? That's the specific purpose for which
17 the lower case end MUXing is used?

18 MR. ALBERT: Yes.

19 MR. GOYAL: Regardless of the locations at
20 which it performs the lower case end MUXing, I
21 believe you agreed in your testimony or--let me
22 take that back.

1 Regardless of the locations where lower
2 case end MUXing is performed, would Verizon agree
3 to any technically feasible interface or
4 interconnection at the POI regardless of what
5 trunks are needed or deMUXing is needed at hub
6 locations to connect it to Verizon switches?

7 MR. ALBERT: Combined all the stuff
8 together you need to separate for purposes of the
9 contract, there are particular specific methods of
10 interconnection, interconnection being the physical
11 connection of the CLEC's facilities and our
12 facilities, which we have spelled out and agreed to
13 in the contracts, mid-span meet is an entrance
14 facility is an example. So, the overall
15 interconnection of the higher capacity pipes, those
16 particular methods are spelled out.

17 When you say any technically feasible,
18 there are probably other ways imaginable,
19 technically possible ways to do it, but in order to
20 put something in the contract I need to be able to
21 do it, to implement it, I will be held to it. We
22 are willing to put a process in the contract to

1 develop stuff that CLECs asked for that doesn't
2 exist today.

3 MR. GOYAL: That would be the BFR process?

4 MR. ALBERT: Correct, which we would use
5 to develop now stuff that doesn't exist.

6 MR. GOYAL: One thing I wanted to
7 understand with respect to transport on Verizon's
8 side of the point of interconnection, is the issue
9 of compensation of Verizon for that transport
10 because am I correct in understanding that Verizon
11 would require that transport if the CLEC is not
12 connecting a DS3 trunk, for example, at a hub
13 location, Verizon would require additional
14 transport from a separate point of interconnection
15 to a hub location in order to deMUX it to terminate
16 it in switches? Am I correct in that
17 understanding? The first question was a question
18 about physical transmission, not about
19 compensation.

20 MR. ALBERT: DS1s can be ordered to any
21 place, okay? DS3s can be ordered to any place.
22 But multiplexing, the busting down of the DS3s to

1 the DS1s, have to be ordered to the two types of
2 hubs, terminus and the intermediate.

3 MR. GOYAL: And I believe we already
4 covered that multiplex deMUXing is necessary to
5 connect the traffic into the Verizon switches;
6 correct?

7 MR. ALBERT: Yes. All switches
8 connections are DS1s, so the CLEC could do the
9 multiplexing or we could do the multiplexing, but
10 it's got to be broken down to a DS1 to make the
11 final connection of the trunk to the switch.

12 MR. GOYAL: Going back to the diagram that
13 we had up in Verizon Exhibit 59, for the scenario
14 where a CLEC interconnects using a DS3
15 interconnection facility to a co-location in
16 central office A, why does Verizon believe that the
17 CLEC should pay for dedicated transport from the
18 point of interconnection at central office A into
19 the deMUXing equipment at the intermediate hub?
20 Why is it Verizon's position that the CLEC should
21 pay for that transport as opposed to it being a
22 cost born by Verizon?

1 In your answer I would like you to
2 separate your explanation from the issues raised
3 under the VGRIPs proposal, so, for example, assume
4 for purposes of this answer that Verizon gets the
5 VGRIPs proposal and is awarded and does recover
6 transport to a distant point of interconnection for
7 its originating traffic, assuming that
8 hypothetically that is the case, why does Verizon
9 feel it needs to recover from the CLEC for
10 dedicated transport between central office A and
11 the intermediate hub?

12 MR. D'AMICO: Well, this is associated
13 with AT&T sending traffic to Verizon, so in that
14 example, I'm not sure where the tandem is or what
15 end office we are talking about, but let's just
16 assume that the intermediate hub is the tandem, and
17 AT&T wants to put in tandem trunks. So, to get
18 from the co-lo A from their cage to the
19 intermediate hub, that would be transport in order
20 to get them to Verizon's IP, which is a tandem.

21 The other alternative would be for them to
22 go directly from their switch and just order a DS3

1 right into the intermediate hub, which again in
2 this example is a tandem.

3 MR. GOYAL: For traffic that AT&T delivers
4 to a POI at central office A for termination at any
5 one of the end offices indicated in the diagram,
6 would AT&T be paying Verizon reciprocal
7 compensation for the termination of that traffic?

8 MR. D'AMICO: No. If CO A is central
9 office, they could only terminate traffic to that
10 central office.

11 So, in that example--

12 MR. GOYAL: I'm sorry, for this
13 hypothetical, this is assuming the POI was at the
14 central office. There is DS3 interconnection trunk
15 coming into central office A, and then from there
16 Verizon routes it however it needs to route it to
17 the other switched locations in that diagram. And
18 I believe, Mr. Albert, you testified that would be
19 possible if there was--if the CLEC purchased
20 interconnection transport at the DS3 level between
21 central office A and the intermediate hub; correct?

22 MR. ALBERT: Yeah, but the way we would be

1 building it is the way the CLEC specified it
2 ordered to be done.

3 MR. GOYAL: My question is: In that
4 hypothetical, would AT&T be paying Verizon
5 reciprocal compensation for traffic it handed off
6 to Verizon at that central office A location?

7 MR. D'AMICO: If the intermediate hub is a
8 tandem they would pay for transport to get it from
9 the Verizon IP which is a tandem on a facility
10 basis. And once it hits the tandem, Verizon would
11 deliver it to whatever subtending end office the
12 number is home to, and that's where the tandem
13 recip comp rate would recover that.

14 MR. GOYAL: Can you break out for me what
15 rate elements Verizon would recover under
16 reciprocal compensation for that specific
17 hypothetical?

18 MR. D'AMICO: Sure. For any traffic that
19 would be delivered to the tandem, what's included
20 in the tandem recip comp rate would be the
21 recurring tandem port charges, the tandem
22 switching, the inner office, I guess, common

1 mileage--I'm not sure what it's called--from the
2 tandem to the various end offices, and then the
3 end-office switching at the terminating end office.
4 That's kind of bundled up to be the tandem recip
5 comp rate.

6 MR. GOYAL: But that recip comp rate would
7 not include any costs for the transport between
8 central office A and the intermediate hub location?

9 MR. D'AMICO: No, it would not.

10 MR. GOYAL: Does AT&T believe that
11 reciprocal compensation rate should include costs
12 reflecting the transport provided between central
13 office A of the intermediate hub location?

14 MR. TALBOTT: No. AT&T believes it should
15 be permitted to interconnect in a manner that it
16 finds efficient for its own traffic and shouldn't
17 be required to interconnect inefficiently.

18 If the Commission were to order that we--

19 MR. GOYAL: This is a question
20 specifically with respect to AT&T originated
21 traffic handed off at the POI for termination,
22 central office as for termination. I wanted make

1 sure I was clear about that.

2 MR. TALBOTT: Yes, sir. If the traffic
3 were destined to a switch at central office A and
4 we were not permitted to have multiplexing at
5 central office A, which would be the efficient way
6 to deliver traffic, and the Commission were to
7 agree with Verizon that it's not required to allow
8 us to--the Commission does not require Verizon to
9 provide us multiplexing at that location, even
10 though it has it available for its own use, then
11 the Commission should order Verizon to provide any
12 additional transport at no cost to the CLEC.

13 But I think the simpler solution is just
14 to allow the CLEC to determine for itself what's
15 the most efficient way to deliver its traffic.

16 MR. GOYAL: Okay. Moving to the issue of
17 multiplexing at locations other than hub locations,
18 intermediate or terminus hub locations, would AT&T
19 agree that in providing such--and providing
20 cross-connects to interconnection facilities at
21 nonhub locations and cross-connects to
22 interconnection facilities at nonhub locations at

1 whatever interface they're used, Verizon would
2 incur costs in terms of personnel, procedures,
3 physical cross-connects, the installation of MUXing
4 equipment?

5 MR. TALBOTT: Nothing more than it has
6 already established so for its rates. Reciprocal
7 compensation rates are based on TELRIC principles.
8 They're forward-looking costs. The costs for their
9 network for the asynchronous M13 multiplexors
10 described earlier are already in their network.
11 They have forward-looking costs, maybe more
12 efficient to use a three-to-one DCS digital
13 cross-connect system, is probably less costly on a
14 cost basis.

15 It's up to Verizon whether in its network
16 design whether it wants to move to a more modern
17 cost-efficient piece of equipment or leave the
18 older equipment in its network. But in neither
19 case should the CLEC have to bear the costs for
20 Verizon to upgrade its network because Verizon is
21 choosing for itself not whether to upgrade or not.

22 MR. GOYAL: Does that answer apply, in

1 AT&T's opinion, with respect to both recurring
2 charges such as reciprocal compensation as well as
3 nonrecurring charges for the implementation of
4 trunk interconnection?

5 MR. TALBOTT: Yes. However Verizon would
6 choose to derive the functionality needed to
7 provide the termination of our traffic, it could do
8 so.

9 But the rate shouldn't change based on the
10 technology they used to provide that functionality.

11 MR. GOYAL: Mr. Talbott, are you familiar
12 with the FCC's First Local Competition Report and
13 Order?

14 MR. TALBOTT: Some parts more than so than
15 others.

16 MR. GOYAL: Are you familiar with that
17 language in the report and order that discusses the
18 cost recovery for a CLEC's choice of expensive
19 interconnection? Are you familiar with that?

20 MR. TALBOTT: Yes, I am.

21 MR. GOYAL: Could you explain how that
22 language applies, if at all, to the implementation

1 of multiplexing--to the implementation of
2 interconnection at nonhub locations if Verizon has
3 to install additional multiplexing equipment to
4 expand its interoffice facility, et cetera.

5 MR. TALBOTT: I disagree with the
6 assertion of the Verizon witnesses that they need
7 to install additional multiplexing equipment. As
8 they admitted earlier, they do this multiplexing
9 for their own purposes regularly. There is no
10 other way for them to connect their, quote,
11 interoffice network to their switches, except by
12 dual using asynchronous M13 multiplexors. And if
13 those multiplexors are available for their use,
14 they simply need to, quote, assign them for CLEC
15 usage. And their sole distinction is because they
16 have a label on that equipment. And putting a
17 label on equipment free for Verizon's use, and only
18 for Verizon's use, shouldn't alter the costs for a
19 technician to wire up that multiplexor for AT&T's
20 or CLEC's use. The costs would be the same. If
21 Verizon wants to change the technology, it should
22 be free to do so, but that's not expensive either.

1 In Verizon's testimony they asserted that
2 in order for them to do the multiplexing at a
3 nonhub location they would have to install, quote,
4 very expensive piece of digital cross-connect
5 equipment, and I don't believe that's the case.
6 They are free to do so, but they may derive that
7 same functionality with another piece of equipment
8 they use for their own services.

9 So, they're doing it today for themselves
10 and they should be required because it's
11 technically feasible to do it for CLECs.

12 MR. GOYAL: That's all I have on this
13 issue.

14 MR. STANLEY: I have a question for
15 Verizon.

16 Could you explain to me--I'm not sure you
17 did a short time ago--why Verizon is unable to
18 provide multiplexing to requesting CLECs at nonhub
19 locations? Is it a technical feasibility issue, or
20 because the ordering conventions haven't been
21 developed yet through OBF?

22 MR. ALBERT: It's a matter of the

1 necessary equipment to specifically provide DS3 to
2 DS1 multiplexing. Almost all occasions is not to
3 be seen resident and spare in those offices.

4 This asynchronous multiplexor we are
5 talking about on Exhibit 59 that does the DS3 to
6 the DS1 multiplexing, that is a box, a piece of
7 electronics that has a single DS3 coming into it,
8 and it's got 28 DS1s coming out of it.

9 In order for a CLEC to order DS3 to DS1
10 multiplexing, that very specific type, that entire
11 box has to be dedicated to them because it's their
12 DS3 coming into it, and it's their 28 DS1s coming
13 out of it.

14 Offices of ours where we have got these in
15 place will have, for Verizon, will have our DS3s
16 going off to a distant Verizon location and will
17 tend not to have all of the DS1 inputs filled up.
18 So, as we continue to provision circuits on this
19 older stuff, we don't have spare whole ones sitting
20 there that would be needed to provide DS3 to DS1
21 multiplexing.

22 MR. STANLEY: So, I guess my question is: